

**REMARKS**

Claims 9 and 17-35 were pending in the application.

Claims 9 and 17-35 were rejected.

Claim 29 has been canceled, without prejudice or disclaimer.

Claims 9, 25, 30-35 have been amended.

Claims 36-52 have been added.

Reconsideration and allowance of claims 9 and 17-52 is respectfully requested in view of the following.

**The Amendment To The Abstract:**

The Abstract has been amended. No new matter has been added.

**The Rejection of Claims 9 and 17-35:**

Claims 9 and 17-35 were rejected under 35 U.S.C. 102(e) as being anticipated by Campbell et al. (US 6,012,523). The Applicant respectfully traverses.

Campbell et al. discloses a downhole apparatus and method for expanding a tubing that includes an actuating arrangement (190) having a tubular body (192) that houses an annular actuating piston (194) for displacing the expansion cone forming fingers (16,17) of a downhole apparatus (10). (See Figs. 9-11, Col. 7, Lines 3-17). An end of the annular actuating piston (194) is mechanically coupled to an end of an actuating rod (196), and the other end of the actuating rod is coupled to the trolleys (20,21) on which the expansion cone forming fingers (16,17) of the downhole apparatus (10) are mounted. (Id.) The annular actuating piston 194 and the actuating rod (196) are displaced by injecting fluidic materials into the interior of the tubular body (192). (Id.) As a result, the trolleys (20,21) and the cone forming fingers (16,17) of the downhole apparatus (10) are thereby displaced in the same direction. (Id.) Thus, the annular actuating piston (194), the actuating rod (196), the trolleys (20,21), and the cone forming fingers (16,17) of Campbell et al. all move together in unison, without any

relative movement in the longitudinal direction.

Claim 9, as amended, recites: "A method of applying an axial force to a first piston positioned within a first piston chamber, comprising:

positioning a second piston within the first piston chamber;

pressurizing the first piston chamber by injecting fluidic materials into the first piston chamber;

displacing the second piston relative to the first piston within the first piston chamber; and

applying an axial force to the first piston using the second piston within the first piston chamber."

By contrast, the annular actuating piston (194), the actuating rod (196), the trolleys (20,21), and the cone forming fingers (16,17) of Campbell et al. all move together in unison, without any relative movement in the longitudinal direction. Thus, for at least these reasons, the invention of claim 9 is not disclosed or suggested by Campbell et al. Furthermore, for at least the same reasons, the invention of claims 17-34, that depend from claim 9, are also not disclosed or suggested by Campbell et al.

Claim 35, as amended, recites: "A method of displacing an annular expansion cone for radially expanding an expandable tubular member, comprising:

movably coupling the annular expansion cone to a first tubular support member defining an internal passage;

positioning the annular expansion cone within a first annular chamber defined between the expandable tubular member and the first tubular support member;

positioning an annular piston within a second annular chamber defined between the first tubular support member and a second tubular support member; defining a third annular chamber between the annular piston and the first tubular support member that is fluidically coupled to the internal passage of the first tubular support member;

injecting fluidic materials into the second annular chamber to displace the annular piston relative to the annular expansion cone within the second annular chamber;

exhausting fluidic materials displaced by the annular piston out of the third annular chamber into the internal passage of the first tubular support member; and  
the annular piston impacting and displacing the annular expansion cone relative to the first tubular support member;  
wherein the cross sectional area of the second annular chamber is greater than the cross sectional area of the third annular chamber;  
wherein the first and second annular chambers are fluidically isolated from the third annular chamber; and  
wherein a cross sectional area of a region of the first annular chamber upstream from the annular expansion cone is greater than a cross sectional area of a region of the first annular chamber downstream from the annular expansion cone."

By contrast, the annular actuating piston (194), the actuating rod (196), the trolleys (20,21), and the cone forming fingers (16,17) of Campbell et al. all move together in unison, without any relative movement in the longitudinal direction. Thus, for at least these reasons, the invention of claim 35 is also not disclosed or suggested by Campbell et al.

**New Claims 36-52:**

New claims 36-52 recites additional aspects of the invention that are not disclosed or suggested by the prior art of record, either alone or in combination.

Unless stated otherwise, none of the amendment to the claims were made for reasons substantially related to the statutory requirements for patentability.


Furthermore, unless stated otherwise, the amendment to the claims were made to simply make express what had been implicit in the claims as originally worded and therefore is not a narrowing amendment that would create any type of prosecution history estoppel.

### Conclusion

In view of the foregoing amendments and remarks, it is respectfully submitted that the pending claims are drawn to novel subject matter, patentably distinguishable over the prior art of record. The Examiner is therefore respectfully requested to reconsider and allow claims presented for reconsideration herein. To the extent that the present amendment results in additional fees, the Applicant authorizes the Commissioner to charge deposit account no. 08-1394.

Should the Examiner deem that any further amendment is desirable to place this application in condition for allowance, the Examiner is invited to telephone the undersigned at the below listed telephone number.

Respectfully submitted,



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Dated: \_\_\_\_\_

1/16/04

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